

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
3 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
6 Nisha_Brooks-Whittington@fd.org
7 Attorney for Nisha Brooks-Whittington

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 REYNALDO STOCKER,
15 Defendant.
16
17

Case No. 2:20-cr-00287-JAD-BNW

UNOPPOSED MOTION FOR
PRETRIAL SERVICES TO
RETURN PASSPORT

18 The defendant, Reynaldo Stocker, by and through his attorney of record, Assistant
19 Federal Public Defender, Nisha Brooks-Whittington, moves this Court, under Federal Rule of
20 Criminal Procedure 47, Local Criminal Rule 47-1 and 18 U.S.C. § 3154 for Pretrial Services to
21 return Mr. Stocker' passport.

22 Mr. Stocker surrendered his passport to Pretrial Services as ordered. Pretrial Services
23 has indicated that it requires an Order to release the passport to Mr. Stocker. Considering the
24 upcoming change of plea and sentencing hearing, Mr. Stocker seeks an Order to release his
25 passport. His passport should be released if this Court follows the parties' binding plea
26

1 agreement and sentence Mr. Stocker to time served thus relieving him of Pretrial Services
2 supervision.

3 Defense counsel contacted the Assistant United States Attorney concerning this request
4 and she does not oppose it.

5 DATED this 20th of December, 2021.

6 Respectfully submitted,

7 RENE L. VALLADARES
8 Federal Public Defender

9 By: */s/ Nisha Brooks-Whittington*

10 NISHA BROOKS-WHITTINGTON
11 Assistant Federal Public Defender
12 Attorney for Reynaldo Stocker

13 **Order**

14 IT IS ORDERED that ECF No. 55 is GRANTED
15 **subject** to the District Judge's approval of the parties'
16 plea agreement. IT IS FURTHER ORDERED that
17 Pretrial Services will not release Mr. Stocker's passport
18 until the District Judge's approval of the parties' plea
19 agreement.

IT IS SO ORDERED

DATED: 12:13 pm, December 21, 2021

20 

21 BREND A WEKSLER
22 UNITED STATES MAGISTRATE JUDGE
23
24
25
26

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on December 20, 2021, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION FOR PRETRIAL SERVICES TO RETURN PASSPORT** by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU
Acting United States Attorney
MINA CHANG
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Cecilia Valencia

Employee of the Federal Public Defender